



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

Ms. Saadia Eltayeb  
Technology Sciences Group Inc. (TSG)  
1150 18<sup>th</sup> Street, Suite 1000  
Washington, DC 20036

MAR 04 2019

Re: PMN P-17-0119

Dear Ms. Eltayeb:

This letter responds to the above-referenced Premanufacture Notice (PMN), received by the Environmental Protection Agency (EPA) on June 26, 2017. The PMNs described the chemical substances as Alkyl alkenoic acid, alkoxyalkyl ester, polymer with alkyl alkenoate, alkyl alkyl alkenoate and tris alkyl silyl alkyl alkenoate.

EPA has determined in accordance with section 5(a)(3)(C) that the PMN substance is unlikely to present an unreasonable risk of injury to health or the environment under the intended and reasonably foreseen conditions of use. Attached to this letter is a summary of the basis of EPA's determination. EPA has also identified certain circumstances of use that – while not known, intended, or reasonably foreseen conditions of use – EPA would consider to be significant new uses requiring further review. As such, EPA expects to issue a follow-up Significant New Use Rule (SNUR) designating the following as significant new uses:

- Use other than as stated in the PMN; or
- Inhalation exposure to particulate, dust, mist, or aerosol

Under TSCA section 5(g), the company may begin manufacture of the PMN substance immediately and does not need to wait for the 90-day review period to expire.

Please note that 40 CFR 720.102 requires the company, within the first 30 days of commencement of manufacture (which includes import) of a PMN substance, to submit a Notice of Commencement (NOC) to EPA. If the company wishes the chemical identity to be listed on the Confidential Inventory, any prior claim of confidentiality must be reasserted and substantiated in accordance with 40 CFR 720.85(b) and 720.90(b).

Because the company submitted the PMN to EPA after the effective date of the electronic-PMN ("eTSCA/ePMN") final rule (75 FR 773), the company must use the eTSCA/ePMN software to submit their NOC. After April 6, 2012, all submissions are required to be submitted electronically via the

internet using the Central Data Exchange (CDX). Please see [www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/how-submit-e-pmn](http://www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/how-submit-e-pmn) for more information on the e-PMN software and directions on how to register and submit notices via CDX.

If you have any questions or comments, please contact me at (202) 564-8469.

Sincerely,

A handwritten signature in cursive script, appearing to read "Greg Schweer".

Greg Schweer, Chief  
New Chemicals Management Branch